

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
GEO-GROUP COMMUNICATIONS, INC.,

Plaintiff,

Index No. 15-cv-01756 (KPF)

-V.-

RAVI CHOPRA; MAHENDRA SHAH; VIPIN  
SHAH; 728 MELVILLE PETRO LLC; KEDIS  
ENTERPRISES LLC; JMVD HILLSIDE LLC;  
NYC TELECOMMUNICATIONS CORP.; and  
SHALU SURI,

**CONDITIONAL  
STIPULATION AND  
[PROPOSED] ORDER OF  
DISMISSAL OF GEO-  
GROUP'S CLAIMS  
AGAINST VIPIN SHAH**

Defendants.

-----X

Plaintiff Geo-Group Communications, Inc. ("Geo-Group") and Defendant Vipin Shah  
("V. Shah"), by and through their undersigned counsel, hereby STIPULATE AND AGREE that:

1. Geo-Group's Claims against V. Shah are the only remaining claims or counterclaims in this action.
2. Trial of those claims was scheduled to begin on July 12, 2021, but the parties reached a settlement of this action at a final pretrial conference held June 30, 2021. By minute entry dated June 30, 2021, the Court adjourned the trial sine die.
3. V. Shah is a debtor party to the bankruptcy case styled: *In Re Nayana Vipin Chandra Shah and Vipin Bhogilal Shah*, No. 17-70293 (REG) (E.D.N.Y. Bankr.) (Chapter 7) (the "V. Shah Bankruptcy") and a party to the following Adversary Proceedings pending against V. Shah in the same bankruptcy court: *Geo-Group Communications, Inc. v. Vipin Bhogilal Shah and Mahendra Shah*, No. 17-08129-reg (E.D.N.Y. Bankr.); and *Geo-Group Communications,*

*Inc. v. Mahendra B. Shah and Vipin Bhogilal Shah*, No. 17-08128-reg (E.D.N.Y. Bankr.). The settlement is conditioned on the Eastern District of New York Bankruptcy Court (the “Bankruptcy Court”) entering a final, non-appealable order approving the settlement for purposes of that bankruptcy case and those two adversary proceedings.

4. Geo-Group and V. Shah have executed a settlement agreement, which reduces the settlement to a signed writing (the “Settlement Agreement”).

5. Geo-Group and V. Shah have respectfully requested the Court to retain jurisdiction over the Settlement Agreement for purposes of enforcing it and resolving any disputes arising from it. The Court has agreed to retain jurisdiction over the Settlement Agreement for those purposes.

6. Geo-Group and V. Shah are working together to obtain the Bankruptcy Court’s approval of the Settlement Agreement.

7. All of Geo-Group’s claims against V. Shah in this action are conditionally dismissed with prejudice, subject to the Bankruptcy Court’s approval of the Settlement Agreement, and with the Court maintaining jurisdiction over the Settlement Agreement for the purposes described in paragraph 5., above. Geo-Group and V. Shah shall each bear its own attorney’s fees, expenses, and costs.

8. Upon the Bankruptcy Court’s approval of the settlement, Geo-Group and V. Shah, shall promptly and jointly inform the Court, and the dismissal shall then become unconditional.

9. In the event the Bankruptcy Court has not, within 60 days from the execution of this Stipulation by Geo-Group and V. Shah, approved the Settlement Agreement, Geo-Group and

V. Shah shall file with the Court a joint status letter informing the Court of the status of their efforts to achieve Bankruptcy-Court approval of the Settlement Agreement, and shall file such further status reports as the Court shall direct.

10. This Stipulation may be signed in counterparts, and signatures evidenced by a facsimile or PDF copy of a signature page shall have the same force and effect as original signatures.

THE LOREE LAW FIRM

By: \_\_\_\_\_

Philip J. Loree Jr. (PL-2213)  
800 Third Avenue, 28th Fl.  
New York, New York 10022  
(646) 253-0560  
(516) 627-1720 (alt.)  
(516) 941-6094  
[PJL1@LoreeLawFirm.com](mailto:PJL1@LoreeLawFirm.com)

*Attorneys for Plaintiff Geo-  
Group Communications, Inc.*

Dated: July \_\_\_, 2021

MANDEL BHANDARI LLP

By: \_\_\_\_\_

Shomik Ghosh  
80 Pine Street, 33<sup>rd</sup> Floor  
New York, NY 10005  
(212) 269-5600  
(203) 285-4398  
[sg@mandelbhandari.com](mailto:sg@mandelbhandari.com)

*Attorneys for Defendant  
Vipin Shah*

Dated: July 9, 2021

**SO ORDERED:**

\_\_\_\_\_  
KATHERINE POLK FAILLA  
United States District Judge

Dated: \_\_\_\_\_, 2021  
New York, New York

To: All Counsel of Record (by ECF) and Pro Se Party  
Mahendra Shah (by email and ECF)